

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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TRAVELERS INDEMNITY COMPANY, :
TRAVELERS INDEMNITY COMPANY OF :
CONNECTICUT, formerly known as TRAVELERS :
INDEMNITY COMPANY OF RHODE ISLAND, :
TRAVELERS CASUALTY AND SURETY :
COMPANY, formerly known as THE AETNA :
CASUALTY AND SURETY COMPANY, and :
TRAVELERS PROPERTY CASUALTY :
COMPANY OF AMERICA, formerly known as :
TRAVELERS INDEMNITY COMPANY OF :
ILLINOIS, :
:

Plaintiffs, :
:

vs. :
:

NORTHROP GRUMMAN CORPORATION, :
successor in interest to GRUMMAN :
CORPORATION, NORTHROP GRUMMAN :
SYSTEMS CORPORATION, successor in interest :
to GRUMMAN AEROSPACE CORPORATION, :
:

Defendants, :
:

and :
:

CENTURY INDEMNITY COMPANY, eventual :
successor in interest to INSURANCE COMPANY :
OF NORTH AMERICA, :
:

Nominal Defendant. :
:
:
:
-----X

CASE NO.: 1:12-cv-03040-KBF

**NOTICE OF TRAVELERS' MOTION
FOR SUMMARY JUDGMENT
REGARDING THE COMMUNITY
PARK**

ORAL ARGUMENT REQUESTED

ECF CASE

NOTICE OF TRAVELERS' MOTION FOR SUMMARY JUDGMENT

PLEASE TAKE NOTICE THAT, Plaintiffs and Counterclaim Defendants The
Travelers Indemnity Company; The Travelers Indemnity Company of Connecticut, formerly known
as The Travelers Indemnity Company of Rhode Island; Travelers Casualty and Surety Company,

formerly known as The Aetna Casualty and Surety Company; and Travelers Property Casualty Company of America, formerly known as The Travelers Indemnity Company of Illinois (collectively, “Travelers”), by and through its undersigned attorneys, will move this Court, before the Honorable Katherine B. Forrest, at the Daniel Patrick Moynihan United States Courthouse, 500 Pearl Street, New York, New York 10007, for an Order granting Travelers summary judgment pursuant to Federal Rule of Civil Procedure 56(a).

Travelers respectfully requests that the Court grant its motion for summary judgment that Travelers has no obligation to provide coverage for Bethpage Community Park-related claims, now or in the future, under the Travelers policies with pollution exclusions and under all policies based on statute of limitations and late notice grounds.

Respectfully submitted:

Dated: October 17, 2013
New York, New York

By: /s/ Mary Beth Forshaw

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